

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

12 MAR 1993

Docket Rm. 222
POLICY & PLANNING
BRANCH ROOM 5202
IN REPLY REFER TO:

EX PARTE OR LATE FILED

7329-7/1700A3
DOCKET FILE COPY ORIGINAL

Honorable Bud Cramer
House of Representatives
1318 Longworth Building
Washington, D.C. 20515

RECEIVED

MAR 24 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Congressman Cramer:

This is in reply to your letters of February 19 and 22, 1993, in which you inquired on behalf of several of your constituents regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992).

Congressional

DL E 83-8-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,
AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM 02/26/93

LETTER REPORT

CONTROL NO.	DATE RECEIVED	DATE OF CORRESP	DATE DUE	DATE DUE OLA(857)
9300899	02/26/93	02/19/93	03/18/93	

TITLE	MEMBERS NAME	REPLY FOR SIG OF
Congressman	Bud Cramer	BC

CONSTITUENT'S NAME	SUBJECT
several	inq. comments on PR Docket 92-235

REF TO	REF TO	REF TO	REF TO
PRB <i>Law</i> <i>3-1-93</i>			
DATE	DATE	DATE	DATE
02/26/93			

REMARKS:

*BUD GRAMER
5TH DISTRICT, ALABAMA

COMMITTEE ON PUBLIC WORKS
AND TRANSPORTATION
COMMITTEE ON SCIENCE,
SPACE, AND TECHNOLOGY
SELECT COMMITTEE ON
CHILDREN, YOUTH, AND FAMILIES

Congress of the United States
House of Representatives
Washington, DC 20515-0105

February 19, 1993

1318 LONGWORTH BUILDING
WASHINGTON, DC 20515-0105
(202) 225-4801

403 FRANKLIN STREET
HUNTSVILLE, AL 35801
(205) 551-0190

737 EAST AVALON AVENUE
MUSCLE SHOALS, AL 35661
(205) 381-3450

MORGAN COUNTY COURTHOUSE
Box 668
DECATUR, AL 35602
(205) 355-9400

Mrs. Lou Sizemore
Congressional Liaison Specialist
Federal Communications Commission
1919 M St NW Ste 857
Washington, D.C. 20554-0002

Dear Mrs. Sizemore:

Please find the additional the enclosed letters that I have received regarding Federal Communications Commission (FCC), PR Docket 92-235 currently under consideration by the FCC.

I am respectfully requesting that you peruse the enclosed letters and supply me with written documentation addressing the

PRB
92-235
899

Fred W. Hauck
1235 Brandywine Lane

In summary, I do not want to lose my hobby, my investment in planes and equipment, or see the public endangered. Please oppose the proposed rule.

A handwritten signature in black ink, appearing to read 'Fred W. Hauck', written in a cursive style.

Fred W. Hauck

JAMES M. WEEMS, III

1777 Tall Oak Circle
Birmingham, Alabama 35235

February 9, 1993

FEB 10 1993

Mr. Robert Cramer
House of Representatives
Washington, D.C. 20510

Dear Mr. Cramer:

For the past thirty-two years I have been involved in the building and flying of radio controlled airplanes. The majority of the planes I fly are referred to as "giant scale"; which is indeed a well suited reference as in many cases the model (radio controlled) airplane is reproduced at one-quarter scale the actual plane copied. Planes of this size, although considered by many as a "toy", are powered by gasoline chain saw engines which can be extremely dangerous when coupled with an unreliable radio unit. For this reason, I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The Proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72-76 Mhz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now, the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to radio control frequencies and cause interference to radio control operations. I understand that of the fifty frequencies that are presently available for radio control of model airplanes, only nineteen frequencies will be available for use if the proposed rules are adopted.

When we fly our model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of the property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.


Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

February 9, 1993
Page Two

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my hobby and pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,



James M. Weems, III

February 3, 1993

The Honorable Bud Cramer
1431 Longworth House Office Bldg.
Independence Ave.
Washington, DC 20515

FEB 17 1993

Dear Mr. Cramer:

I have been interested in aviation for as long as I can remember. I am very active in a local club whose members enjoy constructing and operating radio controlled model airplanes.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is FR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

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Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,

James K. Don
723-C Cottonwood Rd
Dothan, AL 36301

February 3, 1993

The Honorable Bud Cramer
1431 Longworth House Office Bldg.
Independence Ave.
Washington, DC 20515

FEB 17 1993

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I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

The Honorable Bud Cramer
United States House of Representatives
Washington, D.C. 20515

DEC 18 1993

I am **very concerned** about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is **PR Docket 92-235**. If adopted, the new rules will greatly reduce the number of frequencies currently assigned for remote control model airplane use. The reduction in frequencies assigned for remote control use will increase the

[illegible]

Congressional

Dur 8 3-8-93

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CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM
02/26/93

LETTER REPORT

CONTROL NO. DATE RECEIVED DATE OF CORRESP DATE DUE DATE DUE OLA(857)

BUD CRAMER
5TH DISTRICT, ALABAMA

COMMITTEE ON PUBLIC WORKS
AND TRANSPORTATION
COMMITTEE ON SCIENCE,
SPACE, AND TECHNOLOGY
SELECT COMMITTEE ON
CHILDREN, YOUTH, AND FAMILIES

Congress of the United States
House of Representatives
Washington, DC 20515-0105
February 22, 1993

PRB
92-235
911

1318 LONGWORTH BUILDING
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(202) 225-4801

403 FRANKLIN STREET
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(205) 551-0190

737 EAST AVALON AVENUE
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DECATUR, AL 35602
(205) 355-9400

Mrs. Lou Sizemore
Congressional Liaison Specialist
Federal Communications Commission
1919 M St NW Ste 857
Washington, D.C. 20554-0002

Dear Mrs. Sizemore:

Please find the additional the enclosed letters that I have received regarding Federal Communications Commission (FCC), PR Docket 92-235 currently under consideration by the FCC.

I am respectfully requesting that you peruse the enclosed letters and supply me with written documentation addressing the concerns raised by my constituents. Furthermore, I am respectfully requesting that you provide me with any information available regarding PR Docket 92-235 in order to keep my interested constituency informed as to the status of this Docket.

Thank you for your time and consideration.

Sincerely,



Bud Cramer
Member of Congress

BC:nrb

2 February, 1993

The Honorable Bud Kramer
United States House of Representatives
Washington, D.C. 20515

FEB 18 1993

Dear Representative Kramer:

I am an Engineer in Huntsville, Alabama and enjoy as a recreational hobby the sport of flying radio controlled (RC) miniature aircraft as do the 70 or so other members of the Rocket City Radio Controllers (RCRC). My interest and involvement in this hobby have lead me to purchase four radio systems. I have updated all of my radio equipment to the latest standards of the Federal Communications Commission (FCC) and the Academy of Model Aeronautics (AMA) in an attempt to minimize risk of property damage and, more importantly, physical harm to people.

I am very concerned that the FCC is now proposing a rule change which will negate the efforts of myself, the AMA, and the many manufacturers of hobby radio equipment. PR Docket 92-235, if adopted, will create significant personal and commercial economic impacts and an unacceptable safety hazard.

The proposed rule change will place an additional four commercial channels in between the channels in our lower band bringing the total to five. A recent equipment upgrade, which was quite expensive to modelers nationwide, has resulted in equipment which can for the most part coexist with the one commercial channel in between our channels. I seriously doubt that the hobby industry will be able to develop low cost equipment to accommodate the situation which would result from PR Docket 92-235 and the modelers as individuals are unlikely to be able to afford another equipment upgrade so soon after the last.

I think you will find that RC modelers are an extremely safety conscious group. Frequency control at flying sites is very sophisticated and procedural conduct is quite strict. I sincerely hope you will join us in our efforts to maintain the safety of our sport by opposing PR Docket 92-235 on the basis of preventing a serious safety hazard to those whom you represent.

Sincerely,



Glen Roberts
2074 Marinawoods Dr.
Huntsville, Alabama 35803
(205) 880-1012

February 9, 1993

The Honorable Robert Cramer
U.S. House of Representatives
Washington, D.C. 20515

FEB 19 1993

Dear Mr. Cramer:

For the past several years, I have been an avid modeler of radio controlled airplanes. Over the years, my financial involvement has grown; I now own thousands of dollars worth of models, radios, tools, and accessories. For the last two years, I have been flying radio controlled airplanes competitively. I am a member of a club that is comprised of more than 100 members; there are several other clubs of a similar size in the areas that surround Huntsville. Radio controlled models support many businesses in the North Alabama area.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and will increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72 to 76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and will cause interference to radio control of model operations. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

When we fly our model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies to assure a safe flying environment.

I do not think that it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think that we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation

Representative Robert Cramer
Washington D.C.

Dear Robert Cramer:

REF. PR DOCKET 92-235

FEB 20 1993

I am writing in reference to the reallocation of remote control frequencies.

I understand that some of the remote control frequencies would be subject to interference. I have several radios with over \$1000 invested. It would be a finical burden to replace or alter the radios. Worse there may be a safety problem due to other radios drifting to our frequency. An uncontrolled model weighing 20 pounds and flying 50 MPH is a definite threat!

Please do not relinquish our frequencies to others.

Thank you
Michael Clifford
111 Fairington Rd.
Huntsville Al.

FFB 18 1993

18 February 1993

To The Honorable Robert Creamer
U.S. House of Representatives
Washington, D.C. 20515

Sir

On 30 January 1993, I received a letter from the Academy of Model Aeronautics (hereafter referred to as "the AMA") concerning the "Notice of Proposed Rule Making" (NPRM-PR Docket 92-235).

I am a retired handicapped veteran and spend many enjoyable hours designing, building, and flying Radio Controlled Models as well as Control Line and small hand launched models. My son (Lifetime Member), my grandson, my granddaughter and I are registered and licensed members of the AMA. We, as a family, enjoy many pleasureable hours together with this hobby. We attend several "out of town" competition and fun type meets which are also attended by many, many non-flying spectators with their families. Safty is a prime factor in this hobby!

Many hours and dollars are consumed in keeping the models in top notch shape to meet the strict safty rules imposed by the AMA. The fast changing technogoly of the radio equipment, the tight tolerances imposed on the radio equipment, and the wear on the equipment forces one, engaged in Radio Controlled Aircraft as a hobby, to periodically replace outdated and worn equipment. This poses a large outlay of money if one is to continue the hobby in a safe manner.

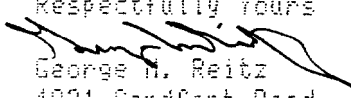
No other hobby or sport that I know of has a safty record better than this hobby. We are controlled by strict rules and regulations that are adhered to at all sanctioned meets. NO-ONE flies without proper training and must possess a current up to date license which includes insurance! People not licensed to fly are not allowed in the pit area or on the flight line. This is for their safty as well as the pilots and their equipment. Radio controlled models are all sizes. Some weigh in excess of 40 pounds and some travel in excess of 100 miles per hour! Controlled only by the experience of the pilot and, more importantly, a good reliable radio on an interference free frequency! I have been in and associated with

If NPRM-PR Docket 92-235 (part 95 pertains to radio control frequencies) is implemented it will have a very profound and deterring effect on the model frequencies used! It will allow other frequencies to be wedged between our "already close frequencies"! It will allow the use of much more powerful transmitters with a tolerance specification which could place their signal directly on the Radio Control Frequencies. With that kind of interference it would render most model frequencies unuseable. The proposed new frequencies are also designated as "Mobile frequencies". Therefore, there would be no way of knowing if someone at the flying field was operating their mobile transmitter. This would indeed cause an aircraft to become completely un-controllable and crash, demolishing many hours of work and several hundred dollars worth of aircraft! This creates a tremendous safety hazard, not only to the aircraft but to all pilots and their property and to several hundred spectators alike! Possibly causing a very fatal accident! The pilot and his aircraft, of course, would be blamed for the accident!

I urge you to find time in your busy schedual to at least visit and talk with the pilots, if possible, at a sanctioned Radio Control flying event in or near your vicinity and see the beautiful, hand crafted aircraft (planes and helicopters) preform a display of acrobatic maneuvers you never dreamed possible! And, of course, visualize you and your family enjoying this spectactuler event and suddenly, for no apparent reason, the aircraft goes completely out of control. This 30 pound, 85 mile per hour aircraft is headed directly toward you and your family and there is nothing anyone can do but say a quick prayer! Would you blame the pilot and his aircraft? Would you blame that unknown person who turned on his higher powered transmitter with a "more lenient" tolerance? Or would you blame those who say "Yes" to NPRM Docket 92-235?

Will you, Rep. Creamer, be one that said "Yes" to NPRM-PR Docket 92-235 or will you say "There Has To Be Another Way"?

Respectfully Yours


George N. Reitz
4321 Sandfort Road
Seale, AL 36875-3509

AMA Lic #308940
Amateur Call N4AG0

February 9, 1993

The Honorable Bud Cramer
1318 Longworth Building
Washington, D.C. 20515

FEB 18 1993

RE: PR Docket 92-235

Dear Mr. Cramer:

I have been interested and involved in model radio controlled model aviation for almost 20 years. The radio control modelers club I belong to is called the Rocket City Radio Controllers (RCRC). We have approximately 100 members and have been flying at the "old airport" in Huntsville. This flying field is located less than 3 miles from downtown Huntsville, surrounded on one side by a public golf course, and on the other by public soccer fields used by elementary and junior high school students.

I am extremely concerned about the proposed rules under consideration by the FCC. If adopted the rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our currently assigned channels are in the 72 - 76 Mhz band. We have co-existed with private land mobile dispatch for several years with minimal interference. We currently have frequency spacings far enough apart that interference is minimal. However, it seems, that soon this may change! This FCC wants to create more land mobile frequencies by dividing the existing bandwidth into smaller slices. These smaller slices will be placed all through our currently used model frequency bands. I have been led to believe that 50 currently available frequencies for model airplanes will be lost, leaving only 19 usable frequencies.

When flying model aircraft, (I and all my fellow modelers) go to great lengths to assure the safety of operators and bystanders and the protection of property. I've got \$1200 invested in one competition pattern aircraft alone. It travels at about 120 miles per hour in flight and weighs approximately 9 lbs. I fly in the presence of hundreds of people at regional contests. Controlled, a "pattern" aircraft is graceful and smooth in the air. Uncontrolled, this aircraft could become a deadly missile inflicting serious harm to property and person. I have no desire to risk anyone's health or well being. A land mobile transmitter operating only 2.5 khz away from my frequency and with 5 to 10 times my power could "swamp" my aircraft receiver and cause a catastrophe! Even worse, it's mobile, so you'll never know WHERE the interference is coming from that caused the accident.

Please understand that some of the models we fly are huge. Some have wingspan of 10 ft and weigh almost 40 lbs. My pattern aircraft required 10 months of my time build (with much love and anticipation). We need the FULL COMPLEMENT of our currently allocated frequencies in order to assure a safe operating environment.

I do not think it is wise to improve the operation conditions of land mobile radio users at the expense of radio control modelers. The FCC may not view radio controlled aircraft modeling as important as business users of mobile radios, but I have a considerable investment in modeling (more than \$3500 and 30 years of dreams). There are thousands like myself who participate in this sport, who love it, dream it, live it and wish to see its continued survival.

Please help me continue the safe enjoyment of my lifelong

February 10, 1993

The Honorable Bud Cramer
United States Senate
Washington D.C. 20510

Dear Mr Cramer,


FEB 18 1993

I have been building and flying radio controlled (RC) airplanes since I
high school. I have always been an interested

The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72 - 76 MHz band.

Sincerely,

A handwritten signature in cursive script, reading "David W. Elmore".

David W. Elmore

The Honorable Bud Cramer
1318 Longworth Bldg.
U.S. House of Representatives
Washington D.C. 20510

Feb. 11, 1993

FFR 19 1993

Dear Mr. Cramer,

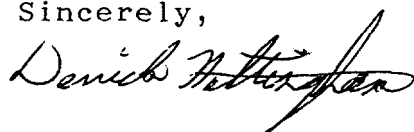
I have been involved in remote controlled airplane building and flying for the past three years, and derive many hours of enjoyment from this hobby. I have invested more hours than I can estimate in building, and have spent over \$2,000.00 in the hobby industry for supplies, radio equipment, etc. I am involved with

death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72 - 76 MHz band.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dennis Hittinger". The signature is written in dark ink and is positioned below the word "Sincerely,".

February 5, 1993

Carl Grover
1603 Saginaw Lane, sw
Decatur, Al. 35603

The Honorable Robert Cramer
U.S. House of Reps.
Washington, D.C. 20515

FEB 20 1993

Dear Mr. Cramer:

This letter is in regards to proposed rule making: PR
Docket 92-235.

As I am sure you are aware, this rule will greatly reduce and jeopardize the frequencies that have currently been allocated to radio controlled model aircraft operators. If the proposed rule goes into affect, there will be land mobile frequencies operating in between the assigned aircraft frequencies. The effect will be interference to radio control operations. Basically, If I am flying my model airplane down at the local flying field and someone in the area has a mobile phone, their transmitter will interfere with mine and cause my plane to go out of control. This is a potentially life threatening situation. My airplanes weigh as much as 13 pounds and have wingspans of up to 7' long. Top speed is approximately 80 miles per hour. I have seen aircraft of this size crash before for a number of reasons and they have the potential to do extensive damage. Secondly, it takes about 6 months of my limited spare time to build an airplane and about \$800.00. All this could be lost in a matter of seconds if it goes out

Edward M. Holliday
2001 Willis Road SE
Huntsville, Ala. 35801

The Honorable Bud Cramer
United States House of Representatives
Washington, D.C. 20510

FEB 19 1993

Dear Representative Cramer:

I am writing with regard to The Federal Communications Commission (FCC) Notice of Proposed Rule Making (NPRM-PR Docket 92-235). I am retired and derive many hours of enjoyment from constructing and operating radio controlled (RC) model aircraft. This NPRM addresses the frequency spectrum in which we (RC modelers) operate our radio equipment.

In 1991 we were allocated, by the FCC, more channels for operation in the same overall frequency band of operation. This increased the number of usable channels to a total of 50, which had been needed for some time because of the increased interest and activity in the RC aircraft model band of 72 MHz. This action required a reduction in channel spacing from 40 KHz to 20 KHz and redesign of new transmitter/receiver equipment. Although older equipment (40 KHz spacing) may be used (except in Academy of Aeronautics sanctioned events of competition), most modelers have gone to the expense of upgrading their equipment (many times involving 5 or 6 units) making the transmitter and receiver narrowband for compatible operation with adjacent transmitters, being only 20 KHz away in frequency. Operations with a mixture of old (wideband-40KHz) equipment and new (1991 forward) narrowband (20KHz) equipment has resulted in many interference situations- with resultant loss of control of model aircraft in the air. Interference between narrowband equipment alone has occurred frequently when the right combination of three channels were being used. I personally experienced an aircraft crash (not mine) which ended up out of control 20 feet in front of me because of this problem, called "3IM", when the right three channels were in use. Verification of this was demonstrated after the crash using the radio equipment involved.

The proposed rules change will affect RC operation on 31 of the present 50 channels. More closely spaced channel operation is proposed--not by adding more RC channels but by injecting channels between present RC channels for use by Private Land Mobile Radio Service (PLMRS). This will result with a channel spacing of 5 KHz for the PLMRS and will provide only a 2.5 KHz spacing between an RC channel and the Mobile Service. A very significant reduction in adjacent channel isolation (presently 10 KHz for RC channels)! This will once again require modification of the RC equipment to permit operation of existing transmitters/receivers on one of the 19 unaffected channels or the purchase of new equipment. Operation on one of the 31 affected channels will involve the risk of interference between the PLMRS and the RC channel. In my case 5 transmitter/receiver combinations are in the 31 channels affected.

More importantly, I am concerned about the safety aspects and potentially increased liability. The proposed changes will permit operation of mobile units with about four times the power of RC units to operate very close in frequency